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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

19
20 RICHARD PAUL MERRELL, individually
and on behalf of all others similarly situated,

21
22 Plaintiff,

23 v.

24 RALPH LAUREN CORPORATION, a
Delaware Corporation; and DOES 1 to 10,
25 inclusive,

26 Defendants.
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Case No. 4:23-cv-06669-HSG
Honorable Haywood S. Gilliam, Jr.

**STIPULATION AND
ORDER CONTINUING PLAINTIFF'S
CLASS CERTIFICATION FACT
DISCOVERY CUTOFF**

1 Plaintiff Richard Paul Merrell (“Plaintiff”) and Defendant Ralph Lauren Corporation
2 (“Defendant”) (collectively, the “Parties”) submit this stipulation and proposed order to continue
3 Plaintiff’s class certification fact discovery cutoff date in this matter for a period of three (3)
4 weeks to allow Defendant additional time to produce documents. The Parties’ stipulation is based
5 on the following:

6 WHEREAS, on December 28, 2023, prior named class representative, Vivian Salazar
7 (“Salazar”), filed her class action complaint against Defendant;

8 WHEREAS, on May 23, 2024, Defendant filed its answer to Salazar’s complaint;

9 WHEREAS, on December 17, 2024, the Parties attempted to mediate this matter;

10 WHEREAS, the mediation was unsuccessful, thus, on January 21, 2025, the Court held a
11 case management conference and set the close of fact and expert discovery related to class
12 certification for July 1, 2025;

13 WHEREAS, on May 12, 2025, due to Salazar wishing to withdraw as named class
14 representative, the Parties submitted a joint statement regarding extending scheduling deadlines
15 and leave to file a proposed amended complaint;

16 WHEREAS, on May 21, 2025, the Court granted leave to file an amended complaint;

17 WHEREAS, on May 21, 2025, Salazar was replaced by Plaintiff in the First Amended
18 Complaint;

19 WHEREAS, on May 21, 2025, the Court reset the Parties’ deadlines and set the close of
20 fact and expert discovery related to class certification of August 12, 2025;

21 WHEREAS, on May 21, 2025, Plaintiff served his First Set of Document Requests Related
22 to Class Certification and his First Set of Interrogatories Related to Class Certification;

23 WHEREAS, on July 1, 2025, Plaintiff served a deposition notice of Defendant’s employee,
24 Sadiki Christie with Document Requests;

25 WHEREAS, on July 1, 2025, Plaintiff served a Rule 30(b)(6) deposition notice of
26 Defendant with Document Requests;

27 WHEREAS, on July 1, 2025, Plaintiff served his Second Set of Document Requests
28 Related to Class Certification;

WHEREAS, on July 17, 2025, the Parties stipulated to continue the class certification discovery deadline to September 2, 2025, only for the purpose of allowing Plaintiff to take the deposition of Ralph Lauren employee, Sadiki Christie, because Mr. Christie was not available for his noticed depositions (noticed for August 11 and 12, 2025) due to vacation;

WHEREAS, on July 23, 2025, the Court granted the stipulation and extended the class certification deadline to September 2, 2025, for the limited purpose of allowing Plaintiff to take Mr. Christie's deposition;

WHEREAS, on August 13, 2025, the Court granted the Parties' prior stipulation extending the class certification discovery deadline as well as extending the class certification briefing schedule (ECF No. 74) to allow Defendant additional time to produce documents;

WHEREAS, Defendant needs an additional three (3) weeks to produce documents responsive to Plaintiff's Document Requests, up to and including to October 14, 2025;

WHEREAS, good cause exists to extend the fact discovery deadline for class certification because Plaintiff needs all documents potentially relevant to class certification;

WHEREAS, the Parties respectfully request the Court continue the class certification discovery cutoff to October 14, 2025 for the sole purpose of allowing Defendant additional time to produce documents.

NOW THEREFORE THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

That the class certification discovery cutoff date of September 23, 2025, be continued to October 14, 2025.

That the scheduling order be modified as follows:

Event	Prior Court-Ordered Deadline	Proposed New Deadline
Close of Fact Discovery Related to Class Certification	September 23, 2025	October 14, 2025

IT IS SO STIPULATED

1 Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that the
2 concurrence in the filing of the document has been obtained from each of the other Signatories.

3
4 Dated: September 23, 2025

5 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

6
7 By /s/ Michael J. Chilleen
8 MICHAEL J. CHILLEEN
9 Attorneys for Defendant,
RALPH LAUREN CORPORATION

10 Dated: September 23, 2025


11 WILSHIRE LAW FIRM, PLC

12
13 By /s/ Thiago M. Coelho
14 Thiago M. Coelho
15 Attorneys for Plaintiff,
16 RICHARD PAUL MERRELL
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/24/2025



Honorable Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT COURT